

Queries

1. If you have any queries relating to this consultation please contact the person named on page 1, who will be able to respond to your questions.

Publication of personal data and confidentiality of responses

2. In accordance with the FSA principle of openness we will hold a copy of the completed consultation. Responses will be open to public access upon request. The FSA will also publish a summary of responses, which may include personal data, such as your full name and contact address details. If you do not want this information to be released, please complete and return the Publication of Personal Data form, which is on the website at <http://www.food.gov.uk/multimedia/pdfs/dataprotection.pdf>. Return of this form does not mean that we will treat your response to the consultation as confidential, just your personal data.
3. In accordance with the provisions of Freedom of Information Act 2000/Environmental Information Regulations 2004, all information contained in your response may be subject to publication or disclosure. If you consider that some of the information provided in your response should not be disclosed, you should indicate the information concerned, request that it is not disclosed and explain what harm you consider would result from disclosure. The final decision on whether the information should be withheld rests with the FSA. However, we will take into account your views when making this decision.
4. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.

Further information

5. A list of interested parties to whom this letter is being sent appears in Annex B. Please feel free to pass this document to any other interested parties, or send us their full contact details and we will arrange for a copy to be sent to them direct.
6. Please let us know if you need paper copies of the consultation documents or of anything specified under '**Other relevant documents**'.
7. This consultation has been prepared in accordance with HM Government Code of Practice on Consultation, available at: <http://www.berr.gov.uk/files/file47158.pdf>. The Consultation Criteria are available at <http://www.berr.gov.uk/whatwedo/bre/consultation-guidance/page44458.html>.
8. Criterion 2 of HM Government Code of Practice on Consultation states *Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible*.
 1. The Code of Practice states that an Impact Assessment should normally be published alongside a formal consultation. We have not provided an Impact Assessment with this guidance, that was done in full when the legislative proposals were made that are the subject of this guidance. If you have any evidence that this guidance adds new burdens to those established at that time please provide it with your comments. You can access those impact assessments through the Agency's website at:

<http://www.food.gov.uk/consultations/consultscot/2008/plasticscot2008>

<http://www.food.gov.uk/consultations/consultscot/2007/contactfoodscot07>

<http://www.food.gov.uk/consultations/consultscot/2005/foodcontactscot2005>

9. For details about the consultation process (not about the content of this consultation) please contact: Food Standards Agency Consultation Co-ordinator, Room 2C, Aviation House, 125 Kingsway, London, WC2B 6NH. Tel: 0207 276 8630.

Comments on the consultation process itself

10. We are interested in what you thought of this consultation and would therefore welcome your general feedback on both the consultation package and overall consultation process. If you would like to help us improve the quality of future consultations, please feel free to share your thoughts with us by using the Consultation Feedback Questionnaire at
11. <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc>
12. If you would like to be included on future Food Standards Agency consultations on other topics, please advise us of those subject areas that you might be specifically interested in by using the Consultation Feedback Questionnaire at <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc>. The questionnaire can also be used to update us about your existing contact details.



Guidance on United
Kingdom Legal
Compliance and Best
Practice for Business
Documentation

**MATERIALS AND
ARTICLES IN CONTACT
WITH FOOD**

January 2009

If you require this information in an alternative format – such as audio, large print, Braille – please contact us.

CONTACT TELEPHONE 0207 276 8553 or 8594

Summary

Intended audience:	This guidance is relevant to businesses that, in the course of their business, use materials and articles intended to come into contact with food, or those that could be brought into contact with food or those that could be the source of chemical migration into food. These businesses will range from large to small in size and scale of operation and will include material and article manufacturers, material recyclers, converters, fillers, importers and sellers on the market. It is also relevant to environmental health and trading standards officers involved in the enforcement of the law governing these materials and articles.
Regional coverage:	This guidance is for those businesses and enforcement officers that operate in the United Kingdom, and refers to parallel legislation in England, Scotland, Wales and Northern Ireland where appropriate.
Legal status:	This guidance is intended to: <ul style="list-style-type: none"> • be used in conjunction with the regulations it names; and, • address issues of best practice as highlighted in the following pages.
Purpose:	This guidance addresses <ul style="list-style-type: none"> • the legal requirements of Regulation (EC) No. 1935/2004 on materials and articles in contact with food in relation to business documentation as it is required in conjunction with Regulation (EC) No. 2023/2006 on good manufacturing practice; plus particular requirements in specific EU measures enacted in legislation across the UK dealing with declarations of compliance as they apply to the materials that are the subject of those measures; and • best practice in this area.

REVISION HISTORY

Revision No.	Revision date	Purpose of revision	Revised by
4	January 2009	Draft Guidance	Richard Sinclair (FSA)

CONTENTS

LEGAL STATUS.....	4
INTRODUCTION	4
FOOD CONTACT MATERIALS	5
LEGISLATION.....	6
BUSINESS DOCUMENTATION	7
GOOD MANUFACTURING PRACTICE (GMP)	9
DECLARATIONS OF COMPLIANCE	10
ISSUES FOR COMPLIANCE DECLARATIONS.....	11
ANNEX 1: COMMON ISSUES TO TAKE INTO ACCOUNT IN DEVELOPING THE PRACTICE AND DOCUMENTATION OF GOOD MANUFACTURING PRACTICES	14
ANNEX 2, PART A: A FORMAT FOR A DECLARATION OF COMPLIANCE BASED ON REGULATION (EC) NO.1935/2004 ARTICLE 3	20
ANNEX 2, PART B: A FORMAT FOR A DECLARATION OF COMPLIANCE BASED ON A SPECIFIC MEASURE E.G. DIRECTIVE 2002/72/EC:	21
ANNEX 3 - REGULATORY TEXT RELEVANT TO LEGAL COMPLIANCE GUIDANCE.....	23
<u>ANNEX 4 – UK STATUTORY INSTRUMENTS</u>	<u>36</u>

LEGAL STATUS

1. These guidance notes should be read in conjunction with the legislation itself. A table of relevant sections of the legislation is provided at Annex 3. The guidance on legal requirements should not be taken as an authoritative statement or interpretation of the law, as only the courts have this power. It is ultimately the responsibility of individual businesses to ensure their compliance with the law. Compliance with the advice on best practice is **not** required by law. **To distinguish between the two types of information, all advice on best practice is in shaded boxes, with a heading of Best Practice.**
2. Businesses with specific queries may wish to seek the advice of their local enforcement agency, which will usually be the trading standards/environmental health department of the local authority.

INTRODUCTION

3. This guidance is based around the legal requirement for ensuring that only safe food contact materials and articles are placed on the market in the United Kingdom and, in a wider context, the European Union. The area of the law with which this guidance concerns itself lays down requirements that ensure that any migration of chemicals from food contact materials and articles into food is at levels that will not harm human health nor detrimentally affect the nature or quality of the food. It focuses on the requirements to document good manufacturing practice procedures and the legal compliance of goods down the manufacturing chain. This is a principle means of control for both the business operator and for the enforcement authorities.
4. Foods come into contact with many different materials during preparation, processing, packing and transportation. These materials will be used in the machinery used to prepare and process the food, package the food and to serve the food to the final consumer. Much of the equipment used in food preparation and processing will consist of many materials, while modern packaging will often consist of multiple layers of different materials.
5. Within the European Union there is detailed legislation that controls the migration of chemicals into food from food contact materials and articles and that legislation is fully implemented in the United Kingdom. The legislation develops continuously as scientific understanding and laboratory techniques improve and develop. These controls exist to ensure that the final consumer is protected from any damaging effects to their health arising from ingesting

food contaminated with harmful levels of chemicals from these materials and articles. These health effects would not be immediately apparent, as would be the case with food poisoning arising from bacterial contamination of the food. The effects are cumulative over a lifetime and affect aspects of, for example, the development of cancers and reproductive health. The controls also exist to ensure that the consumer can buy food that has not been adversely affected by such migration, even if the levels of migration are insufficient to harm health. Finally, the controls ensure that businesses compete for trade throughout the EU under a single set of harmonised rules rather than a plethora of different rules in each one of the EU Member States. It is essential that the rules governing these food contact materials and articles are understood by those who use them in the course of their business and those charged with their enforcement.

6. **It is the sole responsibility of business operators to make sure that the goods in which they trade comply with the law that applies to them.** It is therefore incumbent upon business operators to make sure they are aware of the requirements of the law and ensure their goods comply with it. It is essential that business operators at each stage of the production and commercial use of food contact materials, whether virgin or recycled, and the articles made from them establish their own in-house controls to ensure the compliance of the goods they produce and/or trade in and that they attest that compliance to their customers in relation to the specific rules that apply to the product. As well as ensuring the freedom to trade in safe, legally compliant products, in-house controls and documentation will help ensure that the adventitious migration of chemicals into food is minimised through good manufacturing practice at each stage of production – and this is part of the legal requirement placed upon business operators. **The law applies equally to material and article manufacturers, converters, fillers, sellers and importers.**

FOOD CONTACT MATERIALS

7. Food contact materials and articles comprise a broad and complex range of goods. Among the most widely used materials are the many types of plastic used for bottles, utensils, films and containers. There is also a wide range of paper and board products, laminates and metal and wooden containers. Many modern forms of packaging will make use of all these in a single packaging product and will also contain adhesives to bond layers together and coatings and lacquers that allow the packaging to protect the foodstuff under often very harsh conditions during processing and transportation.

Many materials can be wholly or partially sourced from recycled material from production scrap to post-consumer waste.

8. As well as materials used for packaging the food, others will be used in the equipment that prepares or processes the food. This equipment will bring the food into contact with many different types of surface made from, for example, metal, plastic, wood and rubber. There are also the food surfaces and preparation equipment used in the home and in the garden, barbecues and articles such as crockery and cutlery on which and with which food is served.
9. In addition to these materials and articles, printing inks will have been used on the packaging to attract us to buy it, to inform us of the foodstuffs' ingredients and of its nutritional value to us. There may also be instructions to tell us how to treat the food safely before we consume it. All materials and articles in contact with food directly or indirectly will be made from and probably treated with chemicals to help them perform their role safely and reliably.

LEGISLATION

10. Throughout the EU the core legislation controlling all food contact materials and articles is European Regulation (EC) number 1935/2004. This Regulation came into force on 3 December 2004 and replaced the previous 'framework' Directive that had been in place for fifteen years, Council Directive 89/109/EEC. The European Regulation is directly and fully applicable in all EU Member States. National regulations in each of the countries of the United Kingdom were put in place to establish the means for enforcing the EU Regulation. They also create offences for failing to comply with that Regulation and defences against some alleged offences, along with the penalties that may be imposed by the Courts upon conviction for an offence. (See Annex 4 for the relevant National regulations).
11. The Regulation applies to all materials and articles which, in their finished state, are intended to come into contact with food, including so-called 'active' and 'intelligent' food contact materials and articles. It also brings two other types of materials or articles within the scope of the Regulation. The first are those materials and articles that can reasonably be expected to be brought into contact with foods, for example the linings inside refrigerators. The second are those that can reasonably be expected to transfer their constituents to food, for example, printing inks and adhesive labels that may be used on packaging. However, it specifically excludes covering or coating

substances that are part of the food and that may be eaten with it, such as sausage skin and edible cheese rinds. Also excluded are materials and articles supplied as antiques that may have been manufactured and placed on the market before 1st January 1980, when the first EU-harmonised rules on food contact materials and articles came into effect. Materials and articles that are used in fixed public and consumer water supply systems are also excluded from this Regulation.

12. The Regulation requires that all food contact materials and articles should be manufactured using good manufacturing practice (see paragraph 14 and 18 below). In normal use, they may not transfer their constituents to food in quantities that could endanger human health or cause unacceptable changes in the composition of food or a deterioration to its taste, texture, aroma and appearance. Whilst this encompasses the traditional provision dealing with the adventitious migration of substances for food contact materials and articles, this Regulation also makes a failsafe provision for instances of intended migration that arise in the case of active food contact materials and articles. It also requires that the labelling, advertising and presentation of a material or article shall not mislead the consumer.

BUSINESS DOCUMENTATION

13. The legal requirement for business documentation is based on two sets of needs and they are both rooted in legal requirements laid down in EU legislation. These are: Regulation (EC) No. 2023/2006 on good manufacturing practice and Regulation (EC) No. 1935/2004 on materials and articles in contact with food. This latter Regulation is given further elaboration in Directives: 2002/72/EC on plastic materials and articles in contact with food; 2005/31/EC amending Council Directive 84/500/EEC as regards a declaration of compliance and performance criteria of the analytical method for ceramic articles intended to come into contact with foodstuffs; and, 2007/42/EC relating to materials and articles made of regenerated cellulose film intended to come into contact with foodstuffs. Directive 2002/72/EC is enacted in England by The Plastic Materials and Articles in Contact with Food (England) Regulations 2008 in Wales by The Plastic Materials and Articles in Contact with Food (Wales) Regulations 2008, in Northern Ireland by The Plastic Materials and Articles in Contact with Food Regulations (Northern Ireland), and in Scotland by The Plastic Materials and Articles in Contact with Food (Scotland) Regulations 2008, the other Directives are enacted in England by The Materials and Articles in Contact with Food (England) Regulations 2007, in Wales by The Materials and Articles in Contact with Food (Wales) Regulations 2007, enacted in Northern

Ireland by The Materials and Articles in Contact with Food Regulations (Northern Ireland) 2007 and in Scotland by The Materials and Articles in Contact with Food (Scotland) Regulations 2007. The first of these needs is for the business to ensure the standards of its own processes and procedures to ensure the documentation, application and review of good manufacturing practice. The second is the need for the business to provide adequate documentation to help its downstream customers meet their legal obligations through the provision of comprehensive compliance declarations that address all the legal requirements that pertain to their product(s). Both these requirements are part of a total approach to safe, consistently manufactured, formed and used products. Each part complements the other.

14. Satisfying the first need will require the business to examine its processes and procedures to ensure that it establishes the means for achieving and maintaining acceptable standards of quality and quality control for its products and its customers. To establish and document the processes requires a step by step, systematic approach to identify the minimum acceptable standards for each stage of the business operation. In **manufacturing** this will involve examination and documentation of the process from establishing the standards for raw materials, the time and temperature and other technical requirements of the processes, the means of assuring the quality of the finished product and the means for reviewing, identifying and correcting variations from the standards. In **importing** businesses it will involve examination and documentation of the controls necessary to establish the provenance and quality of the import, including knowledge of the supplier's ability to meet the standards necessary to produce goods that will comply with the EU laws applicable to them.
15. Satisfying the second need will require the business to establish the behavioural characteristics of its product and the quality and/or performance requirements of its customers. In particular, material converters, that is those businesses that convert a material into a food contact article, will need to take account of the legal requirements that apply to each of the components of the article. This could include, for example, different plastic layers (possibly including recycled material), adhesives, coatings, colorants, inks, functional barriers and possibly non-plastic layers. This will ensure the product is fit for the intended purpose and that any restrictions or conditions for the product's use within the legislative requirements are established and explained. The business will have to provide information on the performance of the whole product in relation to the requirements laid down in EU law to ensure the operating margins are understood by the customer in case it affects the customers operation.

16. An important consideration is whether or not so-called 'dual use' additives have been used in the material. That is to say a substance used for its technical effect in the material which is also an authorised food additive. The end user who puts food into the article will have to take account of the presence of the additive in case it migrates to the extent that too much of the additive could be present in the final food. Businesses will want to ensure adequate protection of their proprietary information and may establish procedures with their customers for the exchange of information deemed confidential and commercially sensitive. Measures to ensure the preservation of confidentiality may include confidentiality agreements and exchange of information only between named parties within the businesses. Businesses importing goods from non-EU companies must be particularly careful to ensure that their suppliers are aware of the EU standards with which goods must comply and should have defined procedures in place to ensure this.
17. From this it is clear that each business in the production chain, with the exception of the manufacturers of the starting substances for materials, should have these controls in place and documented. This applies to the producers of the materials used for food contact, to those who convert the materials to products and those who combine these products with other goods, importers and so on through to the seller of the product to the fillers and the retailers.

GOOD MANUFACTURING PRACTICE (GMP)

18. Regulation (EC) No. 2023/2006, from 1 August 2008, requires that businesses establish and document good practices and procedures. The Regulation elaborates the general requirement from the 2004 Regulation in relation to GMP. In so doing it lays down the rules for the groups of materials and articles intended to come into contact with food that are listed in the annexes and combinations of those materials and articles or recycled materials and articles. The regulation applies to all sectors and to all stages of manufacture, processing and distribution of food contact materials and articles, but not the production of the starting substances used in the manufacture of food contact materials and articles. The detail of the Regulation defines GMP as those aspects of quality assurance that ensure that materials and articles are consistently produced and controlled to ensure compliance with the rules applicable to them and with the quality standards appropriate to their intended use. It ties this definition securely into the general requirement, of Article 3, of the 2004 Regulation. It also defines what it means by the terms:

(a) '*good manufacturing practice (GMP)*'. These are those aspects of quality assurance that ensure that materials and articles are consistently produced and controlled to ensure they comply with the law and with the quality standards appropriate to their intended use that does not endanger human health or cause unacceptable changes in the composition of the food or a deterioration in its sensory characteristics;

(b) '*quality assurance system*'. This is the total sum of the organised and documented arrangements made to ensure that materials and articles are of the quality required to comply with the law and the quality standards necessary for their intended use;

(c) '*quality control system*.' This means the systematic application of the quality assurance system to ensure that starting materials, intermediate and finished materials and articles comply with the specification determined in the quality assurance system.

19. In elaborating the first two of these terms, the GMP Regulation requires that business operators document their systems and apply them proportionately to the size of the business to avoid excessive burden on the business. The documented system put in place in the business has to be made available to the Authorities for inspection on demand. Annex 1 provides an outline of some common issues to take account of in developing the use and documentation of good manufacturing practices.

DECLARATIONS OF COMPLIANCE

20. The European Regulation requires that specific measures for particular materials and articles provide for them to be accompanied by a written declaration attesting their compliance with the rules that apply to them. This compliance has to be documented and made available to the authorities on demand. The rules on regenerated cellulose film, ceramics and food contact plastics already contain more detailed provisions concerning compliance declarations.
21. Generally, declarations accompanying food contact materials and articles and provided to the business customer should contain information about:
- i. who manufactured or imported the materials or articles or the substances intended for their manufacture;
 - ii. what they are;
 - iii. when the declaration was made;

- iv. confirmation that the materials or articles meet relevant requirements laid down in Regulation (EC) No 1935/2004 and in any specific measures;
- v. information about the compliance of substances used that are subject to any restrictions and/or specifications that will allow the downstream businesses ensure compliance with those restrictions;
- vi. information about the compliance of substances subject to a restriction in food, about the level of their specific migration and, where appropriate, purity criteria to enable the user of these materials or articles to comply with the law;
- vii. specifications on the use of the material or article, such as:
 - type or types of food with which it is intended to be put in contact;
 - time and temperature of treatment and storage in contact with the food;
 - ratio of food contact surface area to volume used to establish the compliance of the material or article;
- viii. confirmation that the material or article complies with any rules on functional barriers when one is incorporated into the material or article.

Best Practice

The written declaration must make it easy to identify the materials, articles or substances it relates to. It has to be renewed whenever a change in production or materials supply affects changes in the behaviour of the product, migration of substances from it or when new scientific data are available. A senior member of the business providing the declaration should be designated the person responsible for the declaration, its documentation and its provenance.

22. Two generic formats for written declarations are provided at Annex 2 that may inform businesses own document design for such a declaration. These formats deal with the minimum requirements of the legislation.

ISSUES FOR COMPLIANCE DECLARATIONS

23. *Language:* The declaration of compliance and its supporting documentation shall be written in a language understood by the business to which it is provided and the enforcement authority that requires to see it.

Best Practice

Knowledge of suppliers and customers: It is common business good practice to know enough of the requirements of your customers to be able to supply their demands. This knowledge of the customer's requirements should be sufficient to enable the supplier to determine the suitability of the product for the customer's needs in relation to its technical and performance

specification.

Product Analysis: There are two general points:

- Sampling for analysis should be done at critical points in the manufacturing process. These are likely to be points in the process at which critical action takes place, possibly in terms of a temperature or time-critical event or some other event whose success is critical to the finished product;
- Sample analysis should follow a standardised method for which the laboratory has accreditation.

24. *Model calculations:* Modelling to enable migration from food contact plastics to be calculated must follow recognized methods.
25. Retailers of 'own brand' goods are regarded as producers of food and should have the same documentation as 'branded' food producers and processors. Similarly, retailers who import pre-packed food or food contact materials directly should have the same documentation as the mainstream importers of such goods.
26. Some business sectors argue that it is not always possible to provide a comprehensive compliance declaration to all customers. They argue that this is because, in some cases, the detailed use to which the customer might put the material or article cannot be ascertained at their point in the production chain. In such cases, it is argued, the compliance of the material is delegated to the purchaser. In the legislation on food contact plastics Directive 2007/19/EC inserted a new Article 9 into Directive 2002/72/EC that is explicit in requiring that, at the marketing stages other than the retail stage, plastic materials and articles as well as the substances intended for their manufacture, shall be accompanied by a written declaration in accordance with Article 16 of Regulation (EC) No 1935/2004. No exception from this requirement is provided for.
27. However, in providing a declaration in accordance with this requirement, the business supplying the material or article will make it clear what the necessary conditions of use will apply. This may restrict the temperatures to which the article or material may be exposed, or, for example, the types of foodstuff with which it has been tested. Under these circumstances it becomes the responsibility of the purchasing business to test the product under its conditions of use should it depart from those laid down in the compliance declaration provided by the supplier.

28. This has implications for enforcement officers. They need to be aware of the requirement as it exists in the Plastic Materials and Articles in Contact with Food Regulations for food contact plastics in particular as they are enacted in the territories of the United Kingdom.

The Food Standards Agency,
Incident Prevention and Chemical Risk Management Unit,
The Food Contact Materials Team.
London.
January 2009

ANNEX 1: COMMON ISSUES TO TAKE INTO ACCOUNT IN DEVELOPING THE USE AND DOCUMENTATION OF GOOD MANUFACTURING PRACTICES

ACKNOWLEDGEMENT

This annex draws on the guide to good manufacturing practice prepared by the European Council of Paint, Printing Ink and Artists' Colours Industry (CEPE), it does so in conjunction with guides by other European and national representative associations. The Agency is happy to acknowledge the significant contribution their work has made to this more generalised guidance for all businesses to apply as appropriate and proportionately within their businesses.

Best Practice

In relation to the manufacture of food contact materials and articles, Good Manufacturing Practice (GMP) is a legal requirement. It applies to the procedures for their formulation, production and control. The elements of GMP described here will help to ensure that products comply with the law or other generally accepted requirements, are fit for the purpose intended and meet customers needs of the product.

Controls

Manuals

Detailed operational manuals cover orders receipt, formulation, manufacture and product delivery to agreed standards. Recording systems ensure that the correct action for each stage can be verified.

Production Instruction Documents

An instruction document (sometimes called a 'batch card') is issued for each batch of products manufactured. This details the materials, quantities and equipment to be used and highlights any process critical operations and any specific precautions to be followed. Each stage is recorded.

Product Test Specifications

Product test specifications should exist for each product. They list the tests which are required during and following manufacture to ensure the batch meets the required specification and is fit for intended use according to agreed tests. The

specifications should contain the appropriate tolerances for each test.

Quality Review Procedure

In the event of non-compliance at any stage of the process or of a complaint, a procedure should exist to take preventative or corrective action to find the cause, rectify the problem, and if necessary make the appropriate improvement(s) to the manuals or other controls to prevent a repetition. A person should be appointed to accept responsibility for the rectification processes.

Personnel and Training

Commitment

The entire workforce, involving all levels of management should be committed to the objectives of GMP to make it work. The benefits to the business should be obvious.

Training

Training programmes and facilities should be established to ensure that all personnel are fully aware of their functions and responsibilities and are competent to carry them out.

Raw Material Controls

Objective

GMP requires complete co-operation with the suppliers of raw materials and knowledge of the needs of the customer. Raw materials should be carefully selected to ensure that the components of the food contact material or article comply with the requirements of appropriate EU or national legislation, are suitable for the necessary quality standard and are within agreed tolerances.

Suitability

Raw materials should be selected and used so that, when the product is correctly used, it should not:

- endanger human health;
- cause a deterioration in the sensory nature of the foodstuff;
- bring about an unacceptable change in the composition or quality of the foodstuff.

Any industry-wide agreement or practice concerning substances, their purity or

quality criteria that means they should not be used on safety grounds should be observed and noted.

Specifications

Each raw material should have a specification agreed between the supplier and the manufacturing customer. The specification should include physical and chemical properties, including purity criteria, to maintain agreed manufacturing quality and end use technical requirements.

Compliance

Raw materials should be tested in house or, alternatively, be supported by a declaration of compliance from the raw material supplier that relates to the agreed specification and any legal requirements. In some instances pre-delivery samples representing the batch may be submitted to the manufacturing customer for special tests prior to the delivery being accepted.

Identification and Traceability

A name, reference number and batch or delivery number should identify each raw material, so that it can be traced, if necessary. The traceability of raw materials is achieved throughout the production chain and in-house by the delivery and/or batch reference numbers. It is a legal requirement that traceability exists at least to the level of one stage back and one stage forward.

Storage and Use

Raw materials should be stored under conditions that prevent contamination or deterioration. Rejected materials should be clearly marked as such and kept apart from those to be used. Raw material stocks should be rotated and used on a first-in first-out basis.

Material or Article Technical Requirements

The following parameters should be considered and any effect on the material understood when formulating food contact materials and articles:

- Type of material and/or component combinations;
- Type of foodstuffs being brought into contact;
- Type of processes and equipment involved;
- Package-forming and filling processes;
- End-user specifications;
- Compliance to health, safety and consumer protection regulations;
- Compliance with environmental policies manufacturing processes and end-

use.

Food contact material products should be formulated in such a way as to:

- have the necessary resistance to physical and chemical stress,
- be suitable for the method of use/processing and for subsequent converting processes,
- have the substance combination to meet product resistance specifications such as ISO standards or other agreed end use specifications,
- ideally have no measurable transfer or migration of substances into the foodstuff when appropriately used, or migration only within limits in law.

Production

Objective

To convert raw materials into products specified to meet the customers' requirement.

Manufacturing Instruction Document

Manufacturing instructions should be issued and followed for each batch, giving details of the raw materials, the quantities and the equipment to be used. Critical parts of the process should be recorded and checked by the operator.

Manufacturing Formulation

Only raw materials that have passed the prescribed quality control procedures are used in quantities and proportions necessary to ensure the quality of the product.

Equipment

The equipment used should be suitable to manufacture the products required and be maintained in good repair; clean and, where necessary, calibrated. Maintenance documentation should be established and monitored.

Quality Control

Objective

To carry out laboratory and manufacturing tests on manufactured food contact materials and articles to ensure they are supplied to the customer fit for end use, conforming to customer's specifications and the law relating to them.

Production Quality Control

Testing of product samples at selected stages of the process should be carried out in

order to monitor the required quality standard. A procedure should be established for process operators to adjust the process or product within specified limits when necessary.

Testing

Products should be sample tested to ensure they meet established specifications at each critical stage. Test methods may be agreed with customers.

Test Equipment

All measuring equipment must be maintained and tested and/or calibrated where appropriate to a schedule to ensure that the test results are accurate.

Product Information

Identification

A descriptive title or a trade name, reference number and specific batch number, should identify each product.

Compliance

Each delivery of the product must be supported by a declaration of compliance, confirming that it meets the agreed specification, with direct reference to any restriction or criteria laid down in EU law.

Data Sheets and Documentation

Each product has supporting product data sheets detailing relevant chemical, physical and safety data, and suitable end uses and methods of application. Testing on the product during manufacture should be recorded and retained. Data on the legal compliance of the product should also be retained and updated whenever there has been change in production process, raw material or specification.

Packaging

Specification

Packaging for the product should be selected to protect it during shipment and storage and to ensure it conforms to the appropriate national, European and UN requirements for the nature of the product packed and the means of transport.

Cleanliness

New containers should be inspected for cleanliness. Returned containers should be inspected and cleaned, if necessary, to avoid any contamination with other products or foreign materials.

Accurate Filling

Filling controls must be accurate within legal measuring limits. All weighing equipment must be examined for accuracy, re-calibrated if necessary and frequently inspected.

Labelling

Each container should have the minimum following information on labels:

- identification of the producer
- reference number and description of product
- batch number
- net weight
- health, safety and transport information as required.

Storage

All products (including raw materials) should be stored in conditions that prevent, as far as possible, any deterioration of the material. Where appropriate a procedure exists to test stock that may have been held for some time to ensure it continues to conform to specification. Rejected stock should be clearly marked as such and isolated to avoid accidental use.

Delivery

All products should be delivered in clean and clearly labelled suitable containers.

ANNEX 2, PART A: A FORMAT FOR A DECLARATION OF COMPLIANCE BASED ON REGULATION (EC) NO.1935/2004 ARTICLE 3

Best Practice				
Name of Manufacturer/Importer/Supplier				
Batch/Consignment Contents				
Date of Declaration				
Points of note (product usage, storage, handling etc.)				
Identification of food additives used in the material.	Name and CAS number:		Restriction in food:	
Declaration of compliance with Article 3 of Regulation (EC) No 1935/2004				
Substance and CAS Number	Detected Migration Level	Estimated Daily Intake (Evidence of calculations should be maintained in supporting documentation for further reference and examination)	A. Formally pronounced Acceptable Daily Intake or Tolerable Daily Intake ADI/TDI	Compliance/Non-compliance (add any conditional comments)
			B. Company's own calculated safe level of daily intake	
			A.	
			B.	

ANNEX 2, PART B: A FORMAT FOR A DECLARATION OF COMPLIANCE BASED ON A SPECIFIC MEASURE E.G. DIRECTIVE 2002/72/EC:

Best Practice		
Manufacturer/Importer/Supplier		
Contents		
Date of Declaration		
Declaration of compliance with [Title of specific EU measure/National instrument]		
Information about the compliance of substances used that are subject to any restrictions and/or specifications.		
All substances - compliance with the overall migration limit [10 mg/dm ² of the surface area of the material or article] [60 mg/kg foodstuff]		
Individual substances	Restrictions in law	Test results (or estimated level of migration from calculations – method(s) of calculation should be maintained in supporting documentation and retained for inspection by the Authorities)
1.		
Etc.		
Information about the compliance of substances subject to a purity criteria (where applicable)		
Substance	Restrictions in law	Established migration
1		
Etc.		

Information about the use of 'dual-use' additives in the material.		
Food additive	Restriction in food law.	Established migration
1.		
Etc.		
<p>Specifications on the use of the material or article:</p> <p>type or types of food with which it is intended to be put in contact;</p> <p>time and temperature of treatment and storage while in contact with the food;</p> <p>ratio of food contact surface area to volume used to establish the compliance of the material or article;</p> <p>Other specifications:</p>		
Functional barrier (if part of the material or article) – declaration of compliance		
<p>Signed _____ Position _____ -</p> <p>Date _____</p>		

ANNEX 3 - REGULATORY TEXT RELEVANT TO LEGAL COMPLIANCE GUIDANCE

Issue	EC Reference	Extract	UK Reference	Extract	Comment
Defining food contact materials and articles	Regulation (EC) No. 1935/2004 Article 1	<p><i>Article 1</i> Purpose and subject matter 1. The purpose of this Regulation is to ensure the effective functioning of the internal market in relation to the placing on the market in the Community of materials and articles intended to come into contact directly or indirectly with food, whilst providing the basis for securing a high level of protection of human health and the interests of consumers.</p> <p>2. This Regulation shall apply to materials and articles, including active and intelligent food contact materials and articles, (hereinafter referred to as materials and articles) which in their finished state: (a) are intended to be brought into contact with food; or (b) are already in contact with food and were intended for that purpose; or (c) can reasonably be expected to be brought into contact with food or to transfer their constituents to food under normal or foreseeable conditions of use.</p>	<p>The Materials and Articles in Contact with Food (England) Regulations 2007.</p> <p>The Materials and Articles in Contact with Food (Scotland) Regulations 2007.</p> <p>The Materials and Articles in Contact with Food (Wales) Regulations 2007.</p> <p>The Materials and Articles in Contact with Food Regulations (Northern Ireland) 2007.</p>	<p>PART 1 Preliminary Interpretation 2. (3) Expressions used in these Regulations and in Regulation 1935/2004 have the same meaning in these Regulations as in that Regulation</p>	<p>Paragraph 7 - 9 and paragraph 11 of the Guide.</p> <p>In the 1987 regulations a Directive was transposed and terms used in that Directive were defined and used in the regulations. In the 2007 regulations a European regulation is given full effect by the national regulations and it is as a point of clarity that this reference appears.</p>

Issue	EC Reference	Extract	UK Reference	Extract	Comment
Excluding particular materials and articles from the Regulation.	Regulation (EC) No. 1935/2004 Article 1	<i>Article 1</i> Purpose and subject matter 3. This Regulation shall not apply to: (a) materials and articles which are supplied as antiques; (b) covering or coating materials, such as the materials covering cheese rinds, prepared meat products or fruits, which form part of the food and may be consumed together with this food; (c) fixed public or private water supply equipment.	The Materials and Articles in Contact with Food (England) Regulations 2007. The Materials and Articles in Contact with Food (Scotland) Regulations 2007. The Materials and Articles in Contact with Food (Wales) Regulations 2007. The Materials and Articles in Contact with Food Regulations (Northern Ireland) 2007.	PART 1 Preliminary Scope Regulation 3. The provisions of these Regulations do not apply to those materials and articles specified in sub-paragraphs (a), (b) and (c) of Article 1(3).	Paragraph 7 - 9 and 11 of the Guide.
The general requirement.	Regulation (EC) No. 1935/2004 Article 3	<i>Article 3</i> General requirements 1. Materials and articles, including active and intelligent materials and articles, shall be manufactured in compliance with good manufacturing practice so that, under normal or foreseeable conditions of	The Materials and Articles in Contact with Food (England) Regulations 2007. The Materials and	PART 1 General Requirements for Materials and Articles Enforcement of Regulation 1935/2004 Regulation 4. Subject to the provisions of Article 27 (transitional arrangements), any person who contravenes any of the following provisions of Regulation 1935/2004 is guilty of an offence —	Paragraph 12 and 15 and, for GMP, paragraphs 14

Issue	EC Reference	Extract	UK Reference	Extract	Comment
		<p>use, they do not transfer their constituents to food in quantities which could:</p> <p>(a) endanger human health; or</p> <p>(b) bring about an unacceptable change in the composition of the food; or</p> <p>(c) bring about a deterioration in the organoleptic characteristics thereof.</p> <p>2. The labelling, advertising and presentation of a material or article shall not mislead the consumers.</p>	<p>Articles in Contact with Food (Scotland) Regulations 2007.</p> <p>The Materials and Articles in Contact with Food (Wales) Regulations 2007.</p> <p>The Materials and Articles in Contact with Food Regulations (Northern Ireland) 2007.</p>	Article 3 (general requirements);	
<p>Business documentation:</p> <hr/> <p>GMP</p>	Regulation 2023/2006 on GMP	<p><i>Article 4</i></p> <p>Conformity with good manufacturing practice</p> <p>The business operator shall ensure that manufacturing operations are carried out in accordance with:</p> <p>(a) the general rules on GMP as provided for in Article 5, 6, and 7,</p> <p>(b) the detailed rules on GMP as set out in the Annex.</p>	<p>The Materials and Articles in Contact with Food (England) Regulations 2007.</p> <p>The Materials and Articles in Contact with Food (Scotland) Regulations 2007.</p>	<p>PART 2</p> <p>General Requirements for Materials and Articles</p> <p>Enforcement of Regulation 2023/2006</p> <p>Regulation 5 (Regulation 4 in the Northern Ireland regulations) Any person who fails to comply with the requirements of Article 4 (conformity with good manufacturing practice) of Regulation 2023/2006 is guilty of an offence.</p>	Paragraph 13 and 14.

Issue	EC Reference	Extract	UK Reference	Extract	Comment
			<p>The Materials and Articles in Contact with Food (Wales) Regulations 2007.</p> <p>The Materials and Articles in Contact with Food Regulations (Northern Ireland) 2007.</p>		
Declarations of compliance	Regulation 1935/2004	<p><i>Article 16</i> Declaration of compliance 1. The specific measures referred to in Article 5 shall require that materials and articles covered by those measures be accompanied by a written declaration stating that they comply with the rules applicable to them.</p> <p>Appropriate documentation shall be available to demonstrate such compliance. That documentation shall be made available to the competent authorities on demand.</p> <p>2. In the absence of</p>	<p>The Materials and Articles in Contact with Food (England) Regulations 2007</p> <p>The Materials and Articles in Contact with Food (Scotland) Regulations 2007.</p> <p>The Materials and Articles in Contact with Food (Wales) Regulations 2007.</p> <p>The Materials and</p>	<p>PART 2 General Requirements for Materials and Articles Enforcement of Regulation 1935/2004 Regulation 4. Subject to the provisions of Article 27 (transitional arrangements), any person who contravenes any of the following provisions of Regulation 1935/2004 is guilty of an offence — (e) Article 16(1) (declaration of compliance);</p>	<p>Paragraphs 13 and 15.</p> <p>Additional requirements relating to declarations of compliance are given in the specific measures, namely Directives: 2002/72/EC on plastic materials and articles in contact with food; 2005/31/EC amending Council Directive 84/500/EEC as regards a declaration of compliance and performance criteria of the analytical method for ceramic articles intended to come into contact with foodstuffs; and, 2007/42/EC relating to materials and articles made of regenerated cellulose film intended to come into contact with foodstuffs. Directive 2002/72/EC is enacted in England by The Plastic</p>

Issue	EC Reference	Extract	UK Reference	Extract	Comment
		specific measures, this Regulation shall not prevent Member States from retaining or adopting national provisions for declarations of compliance for materials and articles.	Articles in Contact with Food Regulations (Northern Ireland) 2007.		Materials and Articles in Contact with Food (England) Regulations 2008, in Scotland by The Plastic Materials and Articles in Contact with Food (Scotland) Regulations 2008, in Northern Ireland) by The Plastic Materials and Articles in Contact with Food Regulations (Northern Ireland) 2008, the other Directives are enacted in England by The Materials and Articles in Contact with Food (England) Regulations 2007, in Northern Ireland by The Materials and Articles in Contact with Food Regulations (Northern Ireland) 2007, in Scotland by The Materials and Articles in Contact with Food (Scotland) Regulations 2007.
Good manufacturing Practice (detail)	Regulation 2023/2006 on GMP	<p><i>Article 5</i> Quality assurance system 1. The business operator shall establish, implement and ensure adherence to an effective and documented quality assurance system. That system shall:</p> <p>(a) take account of the adequacy of personnel, their knowledge and skills, and the organisation of the premises and equipment such as is necessary to ensure that finished materials and articles comply with the rules applicable to them;</p>	<p>The Materials and Articles in Contact with Food (England) Regulations 2007</p> <p>The Materials and Articles in Contact with Food (Scotland) Regulations 2007.</p> <p>The Materials and</p>	<p>PART 3 General Requirements for Materials and Articles Enforcement of Regulation 2023/2006 Regulation 5 Any person who fails to comply with the requirements of Article 4 (conformity with good manufacturing practice) of Regulation 2023/2006 is guilty of an offence.</p>	<p>Paragraphs 18 and 19</p> <p>Although the European regulation gives detailed provisions regarding GMP in Articles 5, 6 and 7, these all elaborate the basic provision established under Article 4. Our national regulations therefore need only refer to the need to comply with Article 4.</p>

Issue	EC Reference	Extract	UK Reference	Extract	Comment
		<p>(b) be applied taking into account the size of the business run by the operator, so as not to be an excessive burden on the business.</p> <p>2. Starting materials shall be selected and comply with pre-established specifications that shall ensure compliance of the material or article with the rules applicable to it.</p> <p>3. The different operations shall be carried out in accordance with pre-established instructions and procedures.</p> <p><i>Article 6</i> Quality control system 1. The business operator shall establish and maintain an effective quality control system.</p> <p>2. The quality control system shall include monitoring of the implementation and achievement of GMP and identify measures to correct any failure to achieve GMP. Such corrective measures shall be implemented without delay and made available to the competent authorities for inspections.</p> <p><i>Article 7</i> Documentation</p>	Articles in Contact with Food Regulations (Northern Ireland) 2007.		

Issue	EC Reference	Extract	UK Reference	Extract	Comment
		<p>1. The business operator shall establish and maintain appropriate documentation in paper or electronic format with respect to specifications, manufacturing formulae and processing which are relevant to compliance and safety of the finished material or article.</p> <p>2. The business operator shall establish and maintain appropriate documentation in paper or electronic format with respect to records covering the various manufacturing operations performed which are relevant to compliance and safety of the finished material or article and with respect to the results of the quality control system.</p> <p>3. The documentation shall be made available by the business operator to the competent authorities at their request.</p>			
Declarations of Compliance (detail)	<p>Regulation 2023/2006 on GMP</p> <p>Detail is taken from Directive</p>	<p><i>Article 16 (as above)</i></p> <p>ANNEX VIa DECLARATION OF</p>	<p>The Materials and Articles in Contact with Food Regulations 2007 England, Wales, Scotland & Northern Ireland</p> <p>The Plastic Materials and</p>	<p>PART 2 General Requirements for Materials and Articles (as above).</p> <p>Labelling and documentation Regulation 14. (1) At marketing stages other</p>	<p>Paragraph 20-22</p> <p>The generic requirement is in Regulation (EC) No. 1935/2004.</p> <p>However, the most developed expression of the generic</p>

Issue	EC Reference	Extract	UK Reference	Extract	Comment
	2002/72/EC Annex	<p>COMPLIANCE The written declaration referred to in Article 9 shall contain the following information:</p> <p>(1) the identity and address of the business operator which manufactures or imports the plastic materials or articles or the substances intended for the manufacturing of those materials and articles;</p> <p>(2) the identity of the materials, the articles or the substances intended for the manufacturing of those materials and articles;</p> <p>(3) the date of the declaration;</p> <p>(4) confirmation that the plastic materials or articles meet relevant requirements laid down in this Directive and Regulation (EC) No 1935/2004;</p> <p>(5) adequate information relative to the substances used for which restrictions and/or specifications are in place under this Directive to allow the downstream business operators to ensure compliance with those restrictions;</p> <p>(6) adequate information relative to the substances which are subject to a restriction in food, obtained by experimental</p>	<p>Articles in Contact with Food (Scotland) Regulations 2008</p> <p>The Plastic Materials and Articles in Contact with Food Regulations (Northern Ireland) 2008</p>	<p>than the retail stage a person who places on the market any plastic material or article or any substance intended for the manufacture of a plastic material or article must ensure that the plastic material or article or substance is accompanied by a written declaration which —</p> <p>(a) accords with Article 16(1) of Regulation (EC) No. 1935/2004;</p> <p>(b) contains the information specified in Schedule 4.; and</p> <p>(c) complies with paragraph (2). (Scotland Regulations (c) permits an easy identification of the materials, articles or substances for which it is issued.)</p> <p>(2) A written declaration made under paragraph (1) must be revised when substantial changes in the production of a plastic material or article for which the declaration is issued bring about changes in the migration or when new scientific information is available.</p>	<p>requirement is given in the rules on food contact plastics, Directive 2002/72/EC as amended. It is these requirements that are used here as the basis for guidance and best practice.</p>

Issue	EC Reference	Extract	UK Reference	Extract	Comment
		<p>data or theoretical calculation about the level of their specific migration and, where appropriate, purity criteria in accordance with Directives 95/31/EC, 95/45/EC and 96/77/EC to enable the user of these materials or articles to comply with the relevant Community provisions or, in their absence, with national provisions applicable to food;</p> <p>(7) specifications on the use of the material or article, such as:</p> <p>(i) type or types of food with which it is intended to be put in contact;</p> <p>(ii) time and temperature of treatment and storage in contact with the food;</p> <p>(iii) ratio of food contact surface area to volume used to establish the compliance of the material or article;</p> <p>(8) when a plastic functional barrier is used in a plastic multi-layer material or article, the confirmation that the material or article complies with the requirements of Article 7a(2), (3) and 4 of this Directive.</p> <p>The written declaration shall permit an easy identification of</p>			

Issue	EC Reference	Extract	UK Reference	Extract	Comment
		the materials, articles or substances for which it is issued and shall be renewed when substantial changes in the production bring about changes in the migration or when new scientific data are available.			
Language issues	Directive 2002/72/EC, as amended by Directive 2007/19/EC	ANNEX VIa DECLARATION OF COMPLIANCE The written declaration shall permit an easy identification of the materials, articles or substances for which it is issued and shall be renewed when substantial changes in the production bring about changes in the migration or when new scientific data are available.	The Plastic Materials and Articles in Contact with Food (England) Regulations 2008 The Plastic Materials and Articles in Contact with Food (Scotland) Regulations 2008 The Plastic Materials and Articles in Contact with Food (Wales) Regulations 2008	SCHEDULE 4 Information to be contained in a declaration of compliance	Paragraph 23 Schedule 4 brings into effect the main specific provisions of Annex Via of the Directive, but there is no specific reference to language. However, under the due diligence provisions in the legislation the business buying-in the material or article must ensure that it understands any declaration provided to it so that it is able to meet its responsibilities to its downstream customers. It should therefore be a matter of contractual obligation that the declarations it receives are in a language it understands, can use and show to an enforcement officer to establish the compliance of its products.
Mathematical modelling of migration.	Directive 2002/72/EC, as amended by Directive 2007/19/EC	ANNEX VIa DECLARATION OF COMPLIANCE 6) adequate information relative to the substances which are subject to a restriction in food, obtained by experimental data or theoretical calculation	The Plastic Materials and Articles in Contact with Food (England) Regulations 2008	SCHEDULE 4 Information to be contained in a declaration of compliance 6 Adequate information relating to the substances which are subject to a restriction in food, obtained by experimental data or theoretical calculation about the level of their specific migration and, where appropriate,	Paragraph 24 The Directive, and reflected in the regulations, deals with using calculations to establish migration in the context of the compliance declaration. However, as with the issue of language, the business would

Issue	EC Reference	Extract	UK Reference	Extract	Comment
		about the level of their specific migration and, where appropriate, purity criteria in accordance with Directives 95/31/EC, 95/45/EC and 96/77/EC to enable the user of these materials or articles to comply with the relevant Community provisions or, in their absence, with national provisions applicable to food;	<p>The Plastic Materials and Articles in Contact with Food (Scotland) Regulations 2008</p> <p>The Plastic Materials and Articles in Contact with Food (Amendment) Regulations (Northern Ireland) 2008</p>	purity criteria in accordance with the purity Directives to enable the user of the materials or articles to comply with the relevant Community provisions or, in their absence, with national provisions applicable to food.	be failing in its due diligence behaviour if it did not use a recognised, validated method of calculation to establish substance migration levels by theoretical means.

ANNEX 4 - UK STATUTORY INSTRUMENTS

Regulations	<i>Statutory Instrument (SI) No.</i>	<i>ISBN No.</i>
The Materials and Articles in Contact with Food (England) Regulations 2007	2007 No. 2790	978-0-11-078794-7
The Materials and Articles in Contact with Food (Scotland) Regulations 2007	2007 No. 471	978-0-11-078473-1
The Materials and Articles in Contact with Food (Northern Ireland) Regulations 2007	Statutory Rule 2007 No. 434	978-0337-97163-1
The Materials and Articles in Contact with Food (Wales) Regulations 2007	2007 No. 3252 (W.287)	978 0110 916729
The Plastic Materials and Articles in Contact with Food (England) Regulations 2008		
The Plastic Materials and Articles in Contact with Food (Scotland) Regulations 2008	2008 No. 127	978-0-11-081594-7
The Plastic Materials and Articles in Contact with Food (Wales) Regulations 2008	2008 No. 1237 (W.124)	9780110917795
The Plastic Materials and Articles in Contact with Food (Northern Ireland) Regulations 2008	Statutory Rule 2008 No. 167	978-0-337-97355-0

Annex C Interested Parties

3 G's Development Trust	Bryn Gwalia Food Co-operative
4 Seasons kitchen	Bumpylane Organics
4Winds Centre	Burtons Foods Ltd
A & G Williams Felinfoel Faggots	Cadwalader (Ice Cream) Ltd
ACC LTD	Cae Groes bakery Limited
Age Concern Cardiff	Caermynydd Piggery
Age Concern Cardigan	Calypso Soft Drinks Ltd
Age Concern Cymru	Cancercareline
Age Concern Gwent	Capel Farm Communities Management Committee
Age Concern Montgomeryshire	Capel Farm Resource Centre
Age COncern Morgannwg	Cardiff Mind
Age Concern North East Wales	Cardigan Bay Fishermen's Association Ltd
Age Concern North Wales Central	Carmarthenshire Cheese Company Pont Gar
Age Concern Pembrokeshire	Carolin's Real Bread Co
Agri-Food Partnership	Castell Howell Foods
Allison's Celebration Cakes	Castle Dairies Ltd
Always Community Association	Castlering Organic Woodland Pork
Always Fruit & Veg Co-op	Caws Cenarth Cheese
Anglesey Sea Salt Co Ltd	Caws Nantybwl Farmhouse Cheese
Angus Meats Wales	Caws Teifi Cheese
ASBAH in Wales	CBI
Ash Manor Cheese Company limited	Cefn Gola Tenant & Resident Association
Association for the International Promotion of Gum	Cegin Famau Kitchen
Authentic Curry Company Ltd	Celtic Sprit Company
Avana Bakeries limited	CEMVO Wales
AWEMA	Chartered Institute of Environmental Health
B A Jenkins & Sons	Cheeses From Wales Limited
Bangladeshi Community Women's Taster Group	Cig Calon Cymru Cyf
Bar & Restaurant Foods Ltd	Cig Oen Caron
Baraka Foods Ltd	Cig y Llan
Barefoot Workers Project	Citizens' Advice Cymru
BASC	Clam's Hand-Made Cakes
BAWSO	Clark Foods Ltd
Beehive Preserves	Clark's Pies
BELTON CHEESE LTD	Clybiau Plant CYmry Kids Clubs
Berwyn Bakery	Cnwc Goats Yogoat
Bevans Quality Meats Ltd	Consumer Focus Wales
Big Food Group plc	Costa Rica Coffee Co. Ltd
Black Environment Network	Countryside Council for Wales
Blaenafon Cheddar Company	Cowpots Icecream
Blaenymaes Community Food Co-op	Cresci's Ice Cream
Bob The Butcher Wales Ltd	Crossroads in the Vale
Bon Bon Buddies	Cwm Deri Vineyard and Estate
Braces Bakery Ltd	Cwm Harry Land Trust
Bray's Sweets	Cwm Penmachno Food co-op
Bridgend Creamery - Dairy Farmers of Britain	Cwmheidir Farm Dairy
British Association for Shooting and Conservation	Cyrenians Cymru
British Heart Foundation Cymru	D Gibbon & Sons
British Meat Processors Association	D Parisella & Son Ltd
British Sandwich Association	D Sidoli & Sons (Shrewsbury) Ltd
Briwsion	Dailycer
Broadfield Farms Einon Valley Lamb	Dairy Farmers of Britain
Brookes Wye Valley Dairy Co Ltd	Daniel Jones Butchers
Bryn Cocyn Organic Beef and Lamb	Dansco Dairy Products Ltd

Annex C Interested Parties

Daryl's Fresh Meats	Jones Organic Ltd
DEE DAIRY SERVICES	KK Finefoods
Dee Valley Group Plc	Leslie A Parsons and Sons
Deer Initiative	Lewis Pies Ltd
Derimon Smokery	Lewistown and Pant yr Awel Food Co-op
Diabetes UK Cymru	Llaeth y Llan
Disability Wales	Llanelli Centre Project
Douglas Willis Ltd	Llanerch Vineyard
Easibake	Llanfaes Dairy Ice Cream
EBSP	Loseley Dairy Ice Cream Ltd
eira Gwyn - White Snow Dairies	Lowes Soft Drinks
Eppyut Hill & Beulah Face Sheep Society	Mario's Luxury Dairy Ice Cream Fecci's Ice Cream Ltd
ET Jones Sons & Daughters	Mary's Farmhouse
Ethnic Cuisine	Megan's Bakery
EuroCaps Ltd	Memory Lane Cakes Ltd
Ezefill Sandwich Fillings Ltd	MERIDIAN FOODS
Fairbridge De Cymru	Meridian Foods Ltd
Fairbridge Swansea	Mid Wales Food and Land Trust
Farmers' Union of Wales	Montgomery Spring Water Co
Federation of Small businesses	Moorbrook Limited, T/A Ferrari's Coffee
fedwen Bakerys (Cardigan) Ltd	Mr Creamy
Ffenics	Mr Creemy
Franks Ice Cream Ltd	National Association of Head Teachers Cymru
Friends of the Earth Cymru	National Federation of Meat & Food Traders
Funny Honey Foods	National Federation of Women's Institutes
G Costa & Co Ltd	National Sheep Association Cymru Wales
Garth Bakeries	NCH Winchestown Family Centre
Gelynis Fruit Farm and Vineyard	Neath and Port Talbot Borough Council
Glamorgan Federation of Womens Institutes	Noble Foods - Desserts
GM Free Cymru	North Wales and Deeside Shellfish Liaison Group
Goetre Farm Preserves	Open Door Family Centre
Gower Coast Seafoods	Organic Farmers & Growers Ltd
Gower Spring Water Co.	Pann Krisp
Grace Foods	Pant Mawr Farmhouse Cheeses
Graig Farm Organics	Pembrokeshire Local Public Health Team
GREEN AUDIT	Pembrokeshire Mind
Greggs Wales	Pen yr Enfys
GRH Food Company Ltd	Penderyn Distillery
Groundwork Wrexham & Flintshire	Penplas Family Centre
Gwelfor Lunch CLub	Peters Food Service Ltd
Gwersyll yr Urdd	Pin-it Pastry
Gwynedd Confectioners	Plas Farm Ltd
Gwynt y Ddraig Cider	Ponthafren Association
Halo Foods	Pontygwaith Community Centre
Harlech Food Service Ltd	R F Brookes
Haverfordwest Cheese Ltd	R G Bacon
Henllan Bread	Rachel's Dairy
Highmead Dairies Ltd	Radnor Hills Mineral Water Co Ltd
Hill Station Plc	RCGP Wales
Hybu Cig Cymru	RCMA COMMUNITY Garden Allotment
Iceland Frozen Foods	Ready Foods Ltd
Inbev	Real Crisps
JM & A hughes (Station Bakery)	Red cafe
Joe's Ice Cream Parlour	

Annex C Interested Parties

RF BROOKES	Ty Nant Spring Water
Rhosserchan	Uncle Peter's Fudge Company
Roberts of Portdinorwic Ltd	Unilever UK Ltd (Pot Noodle)
Rockfield Food Co-op	Valleys Kids
Rosemarket Spring Water Limited	Vestey Foods UK Ltd - Retail Division
Rowan Foods Ltd	VILLAGE BAKERY (COEDPOETH) LTD
Royal National Institute of Blind People	Vin Sullivan
Royal Welsh Agricultural Society	Wales Council for Voluntary Action
Rubicon Beverages Limited	Warburtons Ltd
S A Brain & Company Ltd	Welsh Black Cattle Society
Saputo Cheese (UK) Ltd	Welsh Development Agency-Food
Saturday Brunch Club	Welsh Farm Organics
Seren Foods	Welsh Fishermen's Association - Northern Section
Shoda Sauces Europe Company Ltd	Welsh Food Alliance
Six Bells Community Food Co-op	Welsh Hills Bakery
Slaters Bakery	Welsh Lamb and Beef Promotions
Snowdonia Cheese Company Ltd	WFAC
Snowdrop Bakery	White's Golden Crust Bakery
Solas Cymru	Wholebake Ltd
South West Rhyl Communities First	Williams Bakery Limited
St Merryn Meats Limited	Williams Shellfish Ltd
Stroke Association	WJ Philips
Sunjuice Ltd	Workers Educational Association
Swansea Community Farm	WRVS
Swansea Vale Resource Centre	WRVS WELSH DIVISION
Talgarth Bakery Ltd	Zorba Foods
Tan y Castell	
Tastebuddies	
Tasties of Chester Ltd	
The Buffalo Dairy Ltd	
The Burger Manufacturing Co Ltd	
The Chocolate House	
The Cooking for Pleasure Group	
The Drop-in Centre	
The Feel Good Factory	
The Fresh Pasta Company Ltd	
The Fruit Garden Wild Fig	
The Knobbly Carrot Food Company	
The Patchwork Traditional Food Company	
The Stroke Association	
The Traditional Welsh Sausage Company	
The Unusual food Co (Cymru) Ltd	
The Village Bakery (Coedpoeth) Limited	
The Welsh Pantry	
Thornhill Farm Shop	
Toloja Orchards	
Tom Soya & The Waterfront Corporation Ltd	
Tovali Limited	
Towards Well - Being Ruby Cool and Ruby Glow	
Trealaw Food Coop	
Trederwen Springs 2008 Ltd	
Tregroes Waffles	
Trethowan's Dairy Ltd	
Trioni Ltd	